

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AMMA AFRIYIE and ROY CAMPBELL,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

NBCUNIVERSAL MEDIA, LLC and
PEACOCK TV, LLC,

Defendants.

Case No. 1:23-cv-09433-VSB

Hon. Vernon S. Broderick

ORAL ARGUMENT REQUESTED

**NOTICE OF MOTION AND MOTION TO DISMISS PLAINTIFFS’
FIRST AMENDED COMPLAINT**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, and Declaration of Jeffrey Landis in Support of Defendants’ Motion to Dismiss First Amended Class Action Complaint dated March 8, 2024, and all prior pleadings, papers, and proceedings in this matter, Defendants NBCUniversal Media, LLC and Peacock TV LLC, by and through their undersigned counsel, move this Court before the Honorable Vernon S. Broderick, United States District Court, Southern District of New York, Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, on a date and time to be designated by the Court, for an Order dismissing Plaintiffs’ First Amended Class Action Complaint pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure.

Dated: March 8, 2024

Respectfully submitted,

By: /s/ Jeffrey Landis

Jeffrey Landis
ZWILLGEN PLLC
1900 M Street NW, Suite 250
Washington, DC 20036
Telephone: (202) 296-3585
Facsimile: (202) 706-5298
Email: jeff@zwillgen.com

Benjamin S. Thomassen*
ZWILLGEN PLLC
One North LaSalle St. Suite 4600
Chicago, IL 60602
Main: (312) 685-2278
Email: ben.thomassen@zwillgen.com

**Pro hac vice application forthcoming*

*Counsel for Defendants
NBCUniversal Media, LLC and Peacock TV LLC*